

LAZARE POTTER GIACOVAS & KRANJAC LLP

Attorneys at Law

950 Third Avenue • New York, New York 10022  
Telephone (212) 758-9300 • Facsimile (212) 888-0919

www.lpgk.com

WRITER'S EMAIL

apremisler@lpgk.com

WRITER'S DIRECT DIAL

(212) 784-3292

**MEMO ENDORSE**

May 1, 2008

RECEIVED

MAY - 2 2008

JUDGE KEENAN'S CHAMBERS

**BY HAND DELIVERY**

Honorable John F. Keenan  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1930  
New York, New York 10007

Re: *Liberty Mutual Insurance Company v. Travelers Property Casualty Co. of America*  
United States District Court for the Southern District of New York  
Case No.: 07 Civ. 11292 (JFK)  
LPGK File No.: 340-736

Dear Judge Keenan:

This firm represents the Defendant Travelers Property Casualty Company of America ("Travelers") in the above referenced matter. Further to the Court's April 15, 2008 directive, I write to advise the Court of the status of the proposed settlement. Although the parties to this and the underlying action have not yet finalized the proposed settlement, the parties appear to have reached an agreement for a global settlement of both actions. In fact, a settlement agreement has been drafted, circulated and signed by some of the parties. Accordingly, the parties to this action jointly request an additional two (2) weeks to finalize the settlement.

Thank you for your attention to this matter.

The application is granted. The parties shall advise the Court of the status of the proposed settlement by May 20, 2008.

Very truly yours,

SO ORDERED.

Dated: New York, New York  
May 5, 2008.

*John F. Keenan*  
U.S.D.J.

Andrew M. Premisler

cc: Marshall T. Potashner, Esq.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 5-5-08